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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

Medford Division

In re the Matter of J.P. and E.P.:

Case No.: 1:24-cv-00648-AA

ARNAUD PARIS,

Petitioner,

and

HEIDI MARIE BROWN,

Respondent.

**RESPONDENT'S RESPONSE TO
PETITIONER'S EMERGENCY
MOTION FOR EXPEDITED HEARING**

The Convention on the Civil Aspects of International Child Abduction,
Done at the Hague on 25 Oct 1980
International Child Abduction Remedies Act, 22 USC § 9001 *et seq.*

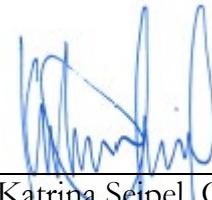
Respondent Heidi Brown (“Mother”), by and through her attorneys, Katelyn D. Skinner, Katrina Seipel, and Buckley Law, PC, hereby responds to Petitioner’s Emergency Motion for Expedited Hearing.

Mother, contemporaneously with this Response, has filed a Motion to Dismiss the Petition in this matter pursuant to the fugitive disentitlement doctrine. Mother relies on her Motion to Dismiss in its entirety in this Response and respectfully requests that this Court dismiss not only the Petition, but this Motion as well. As elaborated on in Mother’s Motion

to Dismiss, Father has repeatedly defied Oregon court orders, and he continues to evade arrest in this country. He should not be permitted to, potentially, reap the benefits of a judicial system the orders of which he continues to flaunt, when such orders are not to his liking. As such, it is only proper to dismiss this action based on the fugitive disentitlement doctrine.

Should this Court be disinclined to do so, Mother does not object to scheduling a trial in this matter on the soonest available date that Mother, Father, and the Court are all available.

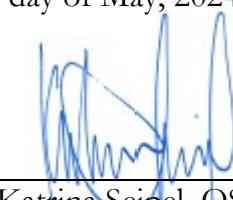
Respectfully submitted this 28th day of May, 2024.



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CERTIFICATE OF SERVICE

I certify that this document was served by e-mail and first-class U.S. mail upon Petitioner Arnaud Paris, to arnaud@skyvr.com, and to his last known address of 13 rue Ferdinand Duval, 75004, Paris, France on this 28th day of May, 2024.



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